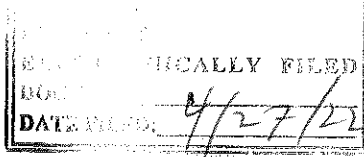




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April 22, 2022

MEMO ENDORSED

VIA ECF

~~Submitted Ex Parte With~~
~~Request for Filing Under Seal~~

Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Martin Torres
18 Cr 748 (LAK)

Dear Judge Kaplan:

This letter is respectfully submitted to request authorization for the use of my firm's associate Christopher R. Neff, to assist me in the above captioned case.

I have been a member of the CJA panel in the Southern and Eastern District since I left the U.S. Attorney's Office in 1991. During my entire tenure as a CJA attorney, I have routinely used associates and paralegals to help me represent my court-appointed clients, just as I do on my retained cases. Doing so allows me to give my CJA clients the personal attention they deserve at a cost below that which would be incurred if I provided all the services myself. Moreover, given the numerous pending matters that I am currently handling, the assistance of Mr. Neff was necessary in order for me to handle this matter appropriately and in a timely fashion.

Since 1996, when I started my own firm, I have always employed one or more full-time associates and paralegals. Currently, I employ one full-time associate. Mr. Neff, who has been working for my firm for approximately ten years, is experienced in handling criminal matters and is highly skilled. He clerked for Judge Batts in the Southern District for two years before joining my firm. Since joining my firm, he has assisted me in representing dozens of clients in criminal matters and has even assisted me in handling a lengthy and complex criminal trial in New York State Supreme Court, New York County. I can say unequivocally that the quality of legal service that my firm and I provide to Mr. Torres would suffer greatly if Mr. Neff was not allowed to assist me in this matter.

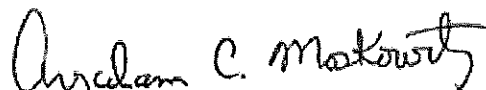
Hon. Lewis Kaplan
April 19, 2022
Page 2

In light of the above, it is respectfully requested that the Court authorize my use of Mr. Neff, nunc pro tunc on this matter. Given the fact that he is a full-time employee of my firm and represents a substantial portion of my firm's overhead, it is further requested that the Court authorize me to bill Mr. Neff's time at \$110 per hour, a rate that has previously been approved by numerous judges in this District and in the Eastern District of New York.

Because this letter deals with defense funding it is being submitted ex parte, with a request that it be filed under seal.

Thank you in advance for your consideration of this application.

Respectfully submitted,

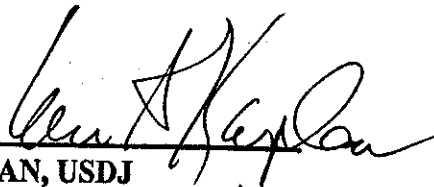


Avraham C. Moskowitz

ACM:bmb



SO ORDERED



LEWIS A. KAPLAN, USDJ

4/27/22